

Exhibit A

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5 *Interim Lead Class Counsel*

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8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10 *In re Wells Fargo Mortgage Discrimination*
11 *Litigation.*

Case No. 3:22-cv-00990-JD

Honorable James Donato

12 **PLAINTIFF CHRISTOPHER WILLIAMS'**
13 **SPECIAL INTERROGATORIES TO**
14 **DEFENDANT WELLS FARGO BANK,**
15 **N.A., SET ONE**

Trial: December 9, 2024

1 PROPOUNDING PARTY: PLAINTIFF CHRISTOPHER WILLIAMS
2 RESPONDING PARTY: DEFENDANT WELLS FARGO BANK, N.A.
3 SET NO.: ONE

4 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff Christopher Williams
5 requests that Defendant Wells Fargo Bank, N.A. respond fully, in writing and under oath, to the
6 following Interrogatories, within thirty (30) days.

7 **DEFINITIONS AND INSTRUCTIONS**

8 Plaintiff's Interrogatories should be read and construed in accordance with the following
9 instructions and definitions:

10 A. In responding to the below Interrogatories, Defendant must furnish all information
11 in its possession, custody or control, including information within the custody or control of its
12 officers, directors, predecessors, successors, attorneys, agents, investigators, employees,
13 independent contractors, and all other persons acting on behalf of Defendant.

14 B. The Interrogatories are to be considered as continuing to the extent permitted by
15 Rule 26 of the Federal Rules of Civil Procedure, and Defendant has an ongoing obligation to
16 provide such supplementary responses, documents and things as it or any other person acting on
17 its behalf may hereafter obtain which augment or otherwise modify Defendant's responses and
18 production to the Interrogatories below. Such supplementary responses and production are to be
19 served upon Plaintiff immediately after their receipt.

20 C. Unless stated otherwise below, these Interrogatories seek all responsive
21 information for the period January 1, 2017 to the present.

22 D. As used herein, the words and phrases in the below Interrogatories shall have the
23 following meaning or meanings:

24 1. "YOU," "YOUR," "DEFENDANT" or "WELLS FARGO" as used herein shall
25 refer to Defendant Wells Fargo Bank, N.A., including its agents, representatives, attorneys,
26 accountants, and others acting or purporting to act on behalf or for the benefit of Defendant.

27 2. "APPLICATION" as used herein shall mean a situation where the customer has
28 made an application for credit and has or has not identified a property.

1 3. “IDENTIFY” as used herein shall be construed with the broadest possible meaning
2 to describe with specificity all relevant information, including with respect to documents and data,
3 to the extent known: the (i) type of document or data; (ii) general subject matter; (iii) date of the
4 documents or data; and (iv) author(s), addressee(s), and recipient(s); with reference to an
5 individual, means such individual’s name, current or last known business title, current or last
6 known business affiliation, current or last known relationship to Defendant, current or last known
7 residential and business address, and current or last known telephone number; and with reference
8 to an entity or entities, means such entity’s full name, state (or country) of incorporation or
9 organization, present or last known address, and present or last known telephone number.

10 4. “APPROVED” as used herein shall mean conditional or final approval of a home
11 purchase, refinance, home equity, or home equity line of credit.

12 Plaintiff’s Interrogatories should be read and construed in accordance with the following
13 instructions and definitions:

14 E. In construing these Interrogatories:

15 a. The singular shall include the plural and the plural shall include the
16 singular.

17 b. A masculine, feminine, or neutral pronoun shall not exclude the other
18 genders.

19 c. Unless otherwise specified, these Interrogatories shall be construed as
20 encompassing the period January 1, 2017 through the present.

21 F. If Defendant claims a privilege over any matter requested herein, Defendant shall
22 provide a privilege log identifying the privilege being asserted, the type of document and its
23 subject matter, date, author name and job title, name and job title of addressee(s), length, bates
24 number, and names and job titles of all recipients and custodians of the document. If Defendant
25 claims a privilege over any portion of a document, the redacted portion should be identified on the
26 privilege log and the remaining portions of the document should be produced.

27 G. If any portion of a document is responsive to any Interrogatory, the entire
28 document should be produced. If following a good faith search, Defendant determines that no

1 responsive documents or data exists; Defendant should expressly so indicate in its response. If a
2 document existed but has been destroyed, identify the last known custodian and describe in detail
3 the circumstances of the document's destruction including date of destruction.

4 **SPECIAL INTERROGATORIES**

5 **SPECIAL INTERROGATORY NO. 1:**

6 IDENTIFY all withdrawn APPLICATIONS where a customer was APPROVED for an
7 interest rate greater than originally requested between January 1, 2018, and the present.

8 **SPECIAL INTERROGATORY NO. 2:**

9 IDENTIFY all withdrawn APPLICATIONS where a customer was APPROVED for an
10 interest rate greater that was not commercially acceptable between January 1, 2018, and the
11 present.

12
13 DATED: December 11, 2023

Respectfully submitted,

14 ELLIS GEORGE CIPOLLONE O'BRIEN LLP

15 By: /s/ Dennis S. Ellis

16 Dennis S. Ellis

17 *Interim Lead Class Counsel*
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1 **PROOF OF SERVICE**

2 *In re Wells Fargo Mortgage Discrimination Litigation*
3 **Case No. 3:22-cv-00990-JD**

4 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of Los Angeles, State of California. My business address is 2121 Avenue
7 of the Stars, 30th Floor, Los Angeles, CA 90067.

8 On December 11, 2023, I served true copies of the following document(s) described as
9 **PLAINTIFF CHRISTOPHER WILLIAMS' SPECIAL INTERROGATORIES TO**
10 **DEFENDANT WELLS FARGO BANK, N.A., SET ONE** on the interested parties in this action
11 as follows:

12 **SEE ATTACHED SERVICE LIST**

13 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** On December 11, 2023, I caused
14 a copy of the document(s) to be sent from e-mail address mmanion@egcfirm.com to the persons at
15 the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the
16 transmission, any electronic message or other indication that the transmission was unsuccessful.

17 I declare under penalty of perjury under the laws of the United States of America that the
18 foregoing is true and correct and that I am employed in the office of a member of the bar of this
19 Court at whose direction the service was made.

20 Executed on December 11, 2023, at Los Angeles, California.

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22 _____
23 Marla Manion
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SERVICE LIST
In re Wells Fargo Mortgage Discrimination Litigation
Case No. 3:22-cv-00990-JD

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5 *Interim Lead Class Counsel*

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8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10 *In re Wells Fargo Mortgage Discrimination*
11 *Litigation.*

Case No. 3:22-cv-00990-JD

Honorable James Donato

12 **PLAINTIFF PAUL MARTIN'S**
13 **INTERROGATORIES TO DEFENDANT**
14 **WELLS FARGO BANK, N.A., SET ONE**

15 Trial: December 9, 2024
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1 PROPOUNDING PARTY: PLAINTIFF PAUL MARTIN

2 RESPONDING PARTY: DEFENDANT WELLS FARGO BANK, N.A.

3 SET NO.: ONE

4 Pursuant to 33 of the Federal Rules of Civil Procedure, Plaintiff Paul Martin ("Plaintiff"),
5 individually and as representative of a nationwide class of similarly situated applicants for original
6 purchase mortgage, refinance and other home mortgage loans, by and through his attorneys,
7 requests that Defendant Wells Fargo Bank, N.A., a Delaware corporation respond fully, in writing
8 and under oath, to the following Interrogatories (the "Interrogatories") at the offices of Plaintiff's
9 counsel, Ellis George Cipollone O'Brien LLP, 2121 Avenue of the Stars, 30th Floor, Los Angeles,
10 California 90067, as required by Federal Rule of Civil Procedure 33 within 30 days of service.

11 **DEFINITIONS AND INSTRUCTIONS**

12 Plaintiff's Interrogatories should be read and construed in accordance with the following
13 instructions and definitions:

14 A. In responding to the below Interrogatories, Defendant must furnish all information
15 in its possession, custody or control, including information within the custody or control of its
16 officers, directors, predecessors, successors, attorneys, agents, investigators, employees,
17 independent contractors, and all other persons acting on behalf of Defendant.

18 B. The Interrogatories are to be considered as continuing to the extent permitted by
19 Rule 26 of the Federal Rules of Civil Procedure, and Defendant has an ongoing obligation to
20 provide such supplementary responses, documents and things as it or any other person acting on
21 its behalf may hereafter obtain which augment or otherwise modify Defendant's responses and
22 production to the Interrogatories below. Such supplementary responses and production are to be
23 served upon Plaintiff immediately after their receipt.

24 C. Unless stated otherwise below, these Interrogatories seek all responsive
25 information for the period January 1, 2017 to the present.

26 D. As used herein, the words and phrases in the below Interrogatories shall have the
27 following meaning or meanings:

1 1. “DOCUMENT” or “DOCUMENTS” means all writings, recordings,
2 photographs, originals, and duplicates (each of the foregoing as defined by Federal Rule of
3 Evidence 1001), and shall include, without limitation, drawings, graphs, charts, e-mail, computer
4 records, computer disks, hard drives, electronic or computerized data compilations, however
5 produced or reproduced, any and all written correspondence, letters, telegrams, agreements,
6 contracts, notes, memoranda, instructions, reports, financial statements, demands, data, schedules,
7 notices, work papers, drafts, recordings (whether by electronic or other means), videotapes,
8 analyses, interoffice or intercompany communications, notebooks, diaries, daily logs, appointment
9 calendars, sketches, plans, specifications, blue prints, plats, diagrams, forms, manuals, brochures,
10 catalogs, lists, publications, phone scripts, printouts from websites, minutes of meetings, journals,
11 ledgers or other financial records, invoices, work tickets, purchase orders, canceled checks, and all
12 other written or graphic material of any nature whatsoever, in Wells Fargo’s possession or control.
13 A draft or non-identical copy of any Document requested herein is a separate Document within the
14 meaning of this term.

15 2. “EMPLOYEE” means any agent performing work on Wells Fargo’s behalf,
16 whether classified as an employee or independent contractor, in the present or in the past.

17 3. “IDENTIFY,” should be construed with the broadest possible meaning to
18 describe with specificity all relevant information, including with respect to documents and data, to
19 the extent known: the (i) type of document or data; (ii) general subject matter; (iii) date of the
20 documents or data; and (iv) author(s), addressee(s), and recipient(s); with reference to an
21 individual, means such individual’s name, current or last known business title, current or last
22 known business affiliation, current or last known relationship to Defendant, current or last known
23 residential and business address, and current or last known telephone number; and with reference
24 to an entity or entities, means such entity’s full name, state (or country) of incorporation or
25 organization, present or last known address, and present or last known telephone number.

26 4. “RELATED TO” means any and all of the following terms and their
27 synonyms: refer to, discuss, constitute, evidence, pertain to, mention, support, undermine,
28 disprove, refute, contradict, negate, bear on, amend, revise, modify, touch on, contain, embody,

1 reflect, identify, state, deal with, concern, comment on, summarize, respond to, relate to, or
2 describe.

3 5. “PERSON,” in the plural as well as the singular, means any natural person,
4 association, partnership, corporation, joint venture, government entity, organization, limited
5 liability company, trust, institution, proprietorship, or any other entity recognized as having an
6 existence under law.

7 6. “YOU,” “YOUR,” “DEFENDANT,” or “WELLS FARGO” means and
8 refers to Defendant Wells Fargo Bank, N.A., a Delaware corporation, and any associated or
9 affiliated corporation, partnership, or other entity, including, but not limited to, any current or
10 former officer, director, employee, agent, or other representative of Defendant, or any other person
11 or entity acting or purporting to act on Defendant’s behalf.

12 E. In construing these Interrogatories:

13 1. The singular shall include the plural and the plural shall include the
14 singular.

15 2. A masculine, feminine, or neutral pronoun shall not exclude the other
16 genders.

17 3. Unless otherwise specified, these Interrogatories shall be construed as
18 encompassing the period January 1, 2017 through the present.

19 F. If Defendant claims a privilege over any matter requested herein, Defendant shall
20 provide a privilege log identifying the privilege being asserted, the type of document and its
21 subject matter, date, author name and job title, name and job title of addressee(s), length, bates
22 number, and names and job titles of all recipients and custodians of the document. If Defendant
23 claims a privilege over any portion of a document, the redacted portion should be identified on the
24 privilege log and the remaining portions of the document should be produced.

25 G. If any portion of a document is responsive to any Interrogatory, the entire
26 document should be produced. If following a good faith search, Defendant determines that no
27 responsive documents or data exists; Defendant should expressly so indicate in its response. If a
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document existed but has been destroyed, identify the last known custodian and describe in detail the circumstances of the document's destruction including date of destruction.

INTERROGATORIES

INTERROGATORY NO. 1:

IDENTIFY by loan number all home equity lines of credit (HELOC) applications that YOU approved during the relevant time period where the Uniform Residential Appraisal Report included a comparable with a gross adjustment of 25% or higher.

INTERROGATORY NO. 2:

Relative to YOUR response to Interrogatory No. 1, IDENTIFY YOUR approval rate for HELOC applications where the Uniform Residential Appraisal Report included a comparable with a gross adjustment of 25% or higher, broken out as follows:

- (a) White;
- (b) Black, non-Hispanic;
- (c) Hispanic and Latino, non-white;
- (d) Asian and Pacific Islander; and
- (e) Native American, American Indian or Alaskan Native.

INTERROGATORY NO. 3:

IDENTIFY by loan number all home equity lines of credit (HELOC) applications that YOU approved during the relevant time period where the Uniform Residential Appraisal Report included a comparable with a net adjustment of 15% or higher.

INTERROGATORY NO. 4:

Relative to YOUR response to Interrogatory No. 3, IDENTIFY YOUR approval rate for HELOC applications where the Uniform Residential Appraisal Report included a comparable with a net adjustment of 15% or higher, broken out as follows:

- (a) White;
- (b) Black, non-Hispanic;
- (c) Hispanic and Latino, non-white;
- (d) Asian and Pacific Islander; and

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(e) Native American, American Indian or Alaskan Native.

DATED: December 11, 2023

Respectfully submitted,

ELLIS GEORGE CIPOLLONE O'BRIEN LLP

By: /s/ Dennis S. Ellis

Dennis S. Ellis

Interim Lead Class Counsel

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STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

On December 11, 2023, I served true copies of the following document(s) described as **PLAINTIFF PAUL MARTIN'S INTERROGATORIES TO DEFENDANT WELLS FARGO BANK, N.A., SET ONE** on the interested parties in this action as follows:

BY E-MAIL OR ELECTRONIC TRANSMISSION: On December 11, 2023, I caused a copy of the document(s) to be sent from e-mail address mmanion@egcfirm.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on December 11, 2023, at Los Angeles, California.

[Signature]

Marla Manion

SERVICE LIST
In re Wells Fargo Mortgage Discrimination Litigation
Case No. 3:22-cv-00990-JD

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